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Attorney for Claimant
Misti Mosley

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re) Case No. 19-30088-DM
)
PG&E Corporation,) Chapter 11
) Lead Case, Jointly Administered
and)
) DECLARATION OF MOVANT IN
PACIFIC GAS AND ELECTRIC) SUPPORT OF MOTION PURSUANT TO
COMPANY,) FED. R. BANKR. PROC. 7015 AND 7017 TO
) ENLARGE TIME TO FILE PROOF OF
Debtors.) CLAIM PURSUANT TO FED. R. BANKR.
) PROC. 9006(b)(1)

☒ Affects both Debtors

*All paper shall be filed in the Lead Case,
No. 19-30088-DM

Date: April 7, 2021
Time: 10:00 a.m. (Pacific Time)
Place: Telephonic/Video Appearances Only
United States Bankruptcy Court
Courtroom 17,
450 Golden Gate Ave., 16th Floor
San Francisco, CA
Judge: Hon. Dennis Montali

Objection Date: March 31, 2021

I, Misti Mosley, hereby declare:

1. I am the movant in this matter and I suffered losses and damages in Bangor, CA as a result of the LaPorte Fire in 2017 and subsequently in Paradise, CA as a result of the Camp Fire in the 2018.

2. I had not previously filed a Proof of Claim in these cases for damages sustained in the LaPorte Fire of October 8, 2017 and the Camp Fire of November 8, 2018 due to reasonable reliance on assertions made by my now deceased husband, Clifford Mosley, that he had retained an attorney for both of us, when in fact he had not.
3. Our RV, in which I resided in with my husband Clifford Mosley at the time, and all our personal property was destroyed October 8, 2017 as a result of the LaPorte Fire.
4. Shortly after the LaPorte Fire, we repurchased an RV with funds provided by FEMA.
5. On November 8, 2018 I was living in Paradise, CA and sustained damages as a result of the Camp fire.
6. In August of 2019 my husband asserted to me that he had retained an attorney to represent both of us against PG&E and file claims in these bankruptcy proceedings.
7. On January 21, 2021 my husband passed away.
8. On February 11, 2021 I was contacted by a private investigator attempting to locate me on behalf of my deceased husband's attorney.
9. On February 17, 2021 I spoke with Joseph Feist, an attorney at Northern California Law Group, PC and was informed that my husband had not retained them for me.
10. Between August of 2019 and February 2020, I was under the impression and had full belief that I was represented by counsel for the LaPorte and Camp Fire claims and that a timely Proof of Claim was filed on my behalf.
11. On February 19, 2021 I discussed with Mr. Feist the possibility of filing this motion with the Bankruptcy court to attempt to file a proof of claim on my behalf.
12. On February 22, 2021 I hired Northern California Law Group, PC to file this motion, file my Proof of Claim and pursue my claim with the Fire Victims Trust.

1 13. All statements in this declaration are based on my own personal knowledge and
2 observation and from my review of the court and business records in this case, or upon
3 information and belied as indicated. If called to testify on this matter, I can and would
4 competently testify to the matters set forth in this Declaration.

5 I declare under penalty of perjury pursuant to the laws of the United States of
6 America that the foregoing is true and correct.

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8 Executed this 22nd day of February 2021, in Chico, California.

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11 Dated: 2/22/2021

12 /s/ Misti Mosley

13 Misti Mosley
14 Claimant and Movant
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